

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

INSTITUTO DE EDUCACION
UNIVERSAL, et al,

Plaintiffs

v.

UNITED STATES DEPARTMENT OF
EDUCATION, et al.,

Defendants

CIVIL NO. 98-2225 (RLA)

**MOTION REQUESTING RECONSIDERATION OF DENIAL OF LEAVE
TO WITHDRAW AS LEGAL REPRESENTATIVES**

TO THE HONORABLE COURT:

COMES NOW Plaintiff Instituto de Educación Universal ("IEU") through its counsel of record, and very respectfully Requests reconsideration of the court's order of November 8, 2004, Dkt. No. 72, in which the court denied our request of November 5, 2004, Dkt. 71, requesting to be relieved from legal representation.

Of course, the court held its decision in abeyance until new legal representation arrived. However, in the meanwhile, IEU's former President, Mr. Angel Ruiz, filed legal documents in representation of IEU, without consultation with the undersigned. Had consultation occurred, the motion may have not been filed, or if so, differently.

In truth, communication with Mr. Ruiz is difficult because of his penury, and consequent lack of phones, etc., and it is precisely this which makes it doubtful he will find counsel to handle his affairs -- pro bono -- at this stage. Yet, while the court does not relieve the undersigned and the firm from the representation, we are in a sense, at the mercy of Mr. Ruiz'

independent and well-intentioned -- and having been directly involved with IEU and now impacted by the court's opinion directly -- emotional draftsmanship.

The firm and the undersigned request that the court reconsider its decision and relieve us from the representation, allowing Mr. Ruiz to either engage counsel, or otherwise, taking whatever action is warranted under the circumstances.

WHEREFORE, we respectfully request that the court reconsider its order of November 8, 2004, Dkt. 72, and allow the undersigned and the Schuster Usera & Aguiló LLP Firm to withdraw as legal representatives for the plaintiff.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of November, 2004.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system: Isabel Muñoz-Acosta, Esq., isabel.munoz@usdoj.gov U.S. Attorney's Office District of Puerto Rico, Civil Division, Room 452, Federal Building, Carlos Chardón Ave., Hato Rey, PR 00918 and Luis Rodríguez, luis.rodriguez3@usdoj.gov, as well as to Mr. Angel Ruiz- Rivera, at ARUIZRIVERA@aol.com. Parties may access this filing through the Court's system.

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